

ORAL ARGUMENT REQUESTED

**UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF NEW YORK**

Britney Rudler, *on behalf of herself and all
others similarly situated,*
Plaintiff,

v.

MLA Law Offices, LTC., and John L.
Malevitis,

Defendants.

NOTICE OF MOTION

19-CV-2170 (ERK) (LB)

PLEASE TAKE NOTICE that, pursuant to the Settlement in this matter (ECF No. 83), as well as 15 U.S.C. § 1692k(a)(3) and N.Y.G.B.L. § 349(h), and upon the Memorandum of Law and the Declarations submitted herewith, on _____, 2020, Plaintiff will move before the Honorable Eric R. Komitee, at the United States District Court at 225 Cadman Plaza East, Brooklyn, NY 11201, for an Order:

1. Granting her attorneys' and paralegal fees in the amount of \$78,180.00, as well as any further time spent on this application (to be submitted on reply and following arguments, if any);
2. Granting her costs in the amount of \$1,612.80;
3. Granting, as an equitable remedy, that Plaintiff may pierce the corporate veil to collect these sums and any other sums owing under the Settlement, as against Defendant John L. Malevitis's wholly owned firm, Paladin Law, LTD., or any other wholly-owned entity to which he may shift assets; and

4. In the alternative to (3), if the Court is not satisfied by Plaintiff's showing on veil piercing, allowing Plaintiff further discovery into the corporate structure and financial relationships between Defendants and their wholly-owned entities.

PLEASE TAKE FURTHER NOTICE that, under Fed. R. Civ. P. 27(a)(3), unless otherwise ordered by this Court, response must be filed within 10 days after service of the motion, and a Reply must be filed within 7 days of that response.

Dated: November 26, 2020

Respectfully Submitted,

/s/

J. REMY GREEN
Cohen&Green P.L.L.C.
1639 Centre Street, Suite 216
Ridgewood, NY 11385
(929) 888.9480 (telephone)
(929) 888.9457 (facsimile)
remy@femmelaw.com